

POLICE DEPARTMENT

NEW YORK, N.Y. 10038

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OCT, 15 2014

FCC Mail Room

October 9, 2014

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Ms. Marlene H. Dortch
Secretary
Federal Communications Commission DOCKET FILE COPY ORIGINAL
445 12th Street, SW
Washington, D.C. 20554

Re:

Petition of Telcordia Technologies Inc. to Reform or Strike Amendment 70, to Institute Competitive Bidding for Number Portability Administration and to End the NAPM LLC's Interim Role in Number Portability Administration Contract; Telephone Number Portability; WC Docket No. 09-109, CC Docket No. 95-116

Dear Secretary Dortch:

I write on behalf of the New York City Police Department ("NYPD") regarding the ongoing proceeding concerning the recommendation of the North American Numbering Council ("NANC") that the Federal Communications Commission ("FCC") select Telcordia Technologies, Inc. ("Telcordia") to serve as the next local number portability administrator ("LNPA"). While the NYPD takes no position on the NANC's recommendation of Telcordia as the next LNPA, the NYPD feels strongly that the selection of the next LNPA should not adversely impact its ability to conduct efficiently and effectively critical criminal and counterterrorism investigations.

Currently, the NYPD utilizes a web interface in order to connect with the LNPA and conduct approximately 30,000 queries per year. Using this web interface, the NYPD often searches up to 100 phone numbers at a time and receives instantaneous results from the LNPA. The ability to search up to 100 phone numbers and receive immediate results from this web-based service is critical to NYPD operations. Without this automated process, many of the NYPD's criminal and counterterrorism investigations will suffer due to the time-sensitive nature of these investigations.

Additionally, the current LNPA provides the NYPD with all historical data related to phone numbers of interest. This historical information is an invaluable investigative tool and it is imperative to the NYPD's operations that the next LNPA provide the same service.

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Lastly, as Telcordia is a foreign company, the NYPD wants to ensure that its queries, a number of which involve foreign citizens and are based on sensitive, classified information, are not disrupted by individuals or entities located outside the United States as a result of foreign influence over the LNPA. Moreover, the LNPA vendor must be prohibited from tracking, logging, or preserving queries performed by the NYPD.

The NYPD requests that the FCC take into account the NYPD's public safety and national security concerns when making its determination regarding the next LNPA vendor.

Respectfully,

awrence Byrne

Deputy Commissioner,

Legal Matters

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